

ORIGINAL

IN THE UNITED STATES DISTRICT COURT THE

NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

FILED IN CHAMBERS  
U.S.D.C. Atlanta

JUN 26 2012

JAMES N. HATTEN, Clerk  
By: *Wade - Chief*  
Deputy Clerk

UNITED STATES OF AMERICA :

v. :

WOODROW RUDOLPH DIXON, JR., :

a/k/a "Dro," :

KIRK L. FLOYD, :

a/k/a "Twin," :

CORNELIUS BERNARD WILSON, :

a/k/a "Dog-man," and :

KRISDEON DEWAYNE SLACK :

CRIMINAL ACTION

NO. 1:12-CR-205

COUNT ONE

Beginning on or about May 22, 2012, and continuing until on or about June 21, 2012, in the Northern District of Georgia, the defendants, WOODROW RUDOLPH DIXON, JR., also known as "Dro," KIRK L. FLOYD, also known as "Twin," CORNELIUS BERNARD WILSON, also known as "Dog-man," and KRISDEON DEWAYNE SLACK did unlawfully and willfully conspire to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did conspire to take and obtain cocaine, a Schedule II controlled substance, from the presence of an individual who they believed to be engaged in an

activity affecting interstate commerce, that is, narcotics trafficking, against the will of that individual, by means of actual and threatened force, violence, and fear of injury to the individual.

MANNER AND MEANS OF THE CONSPIRACY

1. As a part of the conspiracy, the defendants, WOODROW RUDOLPH DIXON, JR., also known as “Dro,” KIRK L. FLOYD, also known as “Twin,” CORNELIUS BERNARD WILSON, also known as “Dog-man,” and KRISDEON DEWAYNE SLACK, planned to commit the armed robbery of an individual, “Tony,” who the defendants believed was engaged in trafficking cocaine.

2. As a part of the conspiracy, the defendants, WOODROW RUDOLPH DIXON, JR., also known as “Dro,” KIRK L. FLOYD, also known as “Twin,” CORNELIUS BERNARD WILSON, also known as “Dog-man,” and KRISDEON DEWAYNE SLACK planned to use firearms to commit the robbery.

3. As a part of the conspiracy, the defendants, WOODROW RUDOLPH DIXON, JR., also known as “Dro,” KIRK L. FLOYD, also known as “Twin,” CORNELIUS BERNARD WILSON, also known as “Dog-man,” and KRISDEON DEWAYNE SLACK obtained materials to use during the commission of the robbery of “Tony,” including handcuffs, ski masks, a bulletproof vest, tee shirts labeled

“Police,” and a replica of a badge in a neck holder that bore the words, “Super Police.”

4. As part of the conspiracy, on or about June 21, 2012, Co-defendants KIRK L. FLOYD, also known as “Twin,” CORNELIUS BERNARD WILSON, also known as “Dog-man,” and KRISDEON DEWAYNE SLACK, at the direction of Co-defendant WOODROW RUDOLPH DIXON, JR., also known as “Dro,” traveled to a location, for the purpose of robbing the individual who they believed to be a cocaine trafficker, carrying a Glock .40 caliber handgun, a Ruger .44 Magnum revolver, and a Mossberg shotgun.

All in violation of Title 18, United States Code, Section 1951(a).

### COUNT TWO

1. COUNT ONE of this Indictment is re-alleged and incorporated by reference herein.

2. On or about June 21, 2012, in the Northern District of Georgia, the defendants, WOODROW RUDOLPH DIXON, JR., also known as “Dro,” KIRK L. FLOYD, also known as “Twin,” CORNELIUS BERNARD WILSON, also known as “Dog-man,” and KRISDEON DEWAYNE SLACK, aided and abetted by one another, knowingly carried firearms, that is, one (1) Glock .40 caliber handgun, one (1) Ruger

.44 Magnum revolver, and one (1) Mossberg shotgun, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is, Conspiracy to Commit Hobbs Act Robbery as alleged in Count One of this Indictment; all in violation of Title 18, United States Code, Section 924(c)(1)(A)(i) and Section 2.

### FORFEITURE PROVISION

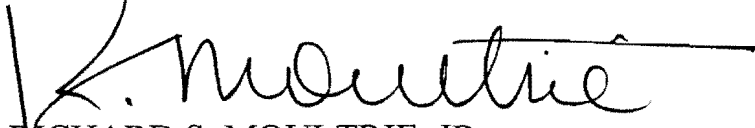
Upon conviction of either of the offenses alleged in Counts One and Two of this Indictment, the defendants, WOODROW RUDOLPH DIXON, JR., also known as "Dro," KIRK L. FLOYD, also known as "Twin," CORNELIUS BERNARD WILSON, also known as "Dog-man," and KRISDEON DEWAYNE SLACK, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of these offenses, including but not limited to the following: one (1) Glock .40 caliber handgun; one (1) Ruger .44 Magnum revolver; and one (1) Mossberg shotgun.

A True BILL



FOREPERSON

SALLY QUILLIAN YATES  
UNITED STATES ATTORNEY



RICHARD S. MOULTRIE, JR.  
ASSISTANT UNITED STATES ATTORNEY  
600 U.S. Courthouse  
75 Spring St., S.W.  
Atlanta, GA 30303  
(404)581-6280  
Georgia Bar No. 527275